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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PYRO-COMM SYSTEMS, INC., et al.,
Plaintiffs,
vs.
INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS, LOCAL
11, et al.,
Defendant.

Case No.: SA CV 06-00802 AG (RZx)
Consolidated with:
Case No.: CV 06-06794 AG (RZx)
PROTECTIVE ORDER

AND CONSOLIDATED ACTION

AND RELATED ACTION
COUNTER-CLAIMS

On July 15, 2009, Defendants and Counter-Claimants, Trustees of the Southern California IBEW-NECA Pension Plan, et al. (the "Trustees") served on non-party, Los Angeles Unified School District ("LAUSD") a subpoena ("Subpoena") seeking production of documents. Among other documents identified in the Subpoena, the Trustees requested production of unredacted certified payroll records ("Unredacted CPRs") prepared by Plaintiff and Counter-Defendant Pyro-Comm Systems, Inc. ("Pyro-Comm").

1 The Unredacted CPRs contain Pyro-Comm's employees' names, addresses, and
2 social security numbers ("Identification Information"). Although this Identification
3 Information is confidential in nature, the Trustees require the information in order to
4 calculate fringe benefit contributions owed by Pyro-Comm.

5
6 **IT IS HEREBY ORDERED**, pursuant to the "Stipulation for Protective Order"
7 entered into by and among the Trustees and the LAUSD, and good cause appearing
8 therefore:

9 1. The LAUSD shall produce the Unredacted CPRs requested in the Subpoena
10 within 30 days of the issuance of this order.

11 2. The Trustees shall not furnish, show, disclose or otherwise disseminate the
12 Unredacted CPRs to any person except to: (a) the Trustees, their agents and employees;
13 (b) counsel for the Trustees and office personnel assisting counsel in the preparation and
14 trial of this action; and (c) experts and consultants who are assisting said counsel in
15 preparation and/or trial. The Trustees shall require any person(s) identified in
16 subparagraphs (a) through (c) to be bound to this order.

17 3. The Unredacted CPRs may only be used for the purpose of calculating,
18 collecting and allocating fringe benefit contributions allegedly owed by Pyro-Comm to
19 the Trustees for work performed by employees of Pyro-Comm. The Unredacted CPRs
20 may not be used for any other purpose by anyone, including those persons identified in
21 Paragraph 2 herein.

22 4. The Unredacted CPRs produced pursuant to the Subpoena shall be
23 maintained in the possession and control of the Trustees and the Trustees' counsel in
24 such a manner that the information is not accessible to individuals not bound by this
25 order.

26 5. Unless the Court orders otherwise, the Trustees may only file the
27 Unredacted CPRs with the Court after obtaining an order to seal pursuant to Local Rules
28 79-5.1 – 79-5.4.

1 6. The Trustees may redact the Unredacted CPRs by blocking out the
 2 Identification Information contained therein. The redacted CPRs, containing no
 3 Identification Information, may be provided to all third parties and may be filed with the
 4 Court without an order to seal.

5 7. In the event that the Trustees are ordered by a court or any state, federal or
 6 governmental unit to produce the Unredacted CPRs, they shall provide reasonable notice
 7 to the LAUSD, through their counsel, of that court order or command, so as to allow the
 8 LAUSD to file an appropriate opposition to such order or command.

9 8. The terms of this Order shall remain in full force and effect and shall not
 10 cease to be in effect because of the final adjudication of this litigation.

11 9. Upon resolution of this action in trial court, the Unredacted CPRs shall be
 12 held by Trustees' counsel pending final resolution of this litigation by appeal or
 13 otherwise. Within six (6) months after such final resolution, the Unredacted CPRs shall
 14 be shredded by the Trustees' counsel. The Trustees' counsel shall give the LAUSD,
 15 through its counsel, notice when the Unredacted CPRs have been shredded.

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 19 DATED: 8/14/09


 UNITED STATES DISTRICT COURT
 MAGISTRATE JUDGE